



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

November 16, 2022

VIA ECF

Honorable Denise L. Cote
United States District Judge
United States District Court
500 Pearl Street, Room 1910
New York, New York 10007

Re: *Bloomberg L.P. v. United States Postal Service*,
22 Civ. 6112 (DLC)

Dear Judge Cote:

This Office represents defendant United States Postal Service (“USPS” or “Defendant”) in the above-referenced Freedom of Information Act case commenced by plaintiffs Bloomberg L.P. and Dow Jones & Company, Inc. (jointly, “Plaintiffs”). We write respectfully to request that the summary judgment deadlines that were so-ordered by the Court on October 18, 2022 [ECF No. 13] be extended pursuant to the proposed revised schedule below. The extension is requested due to the undersigned attorney’s press of business and USPS’s need for additional time to prepare documents in support of its opening motion for summary judgment. This is USPS’s first request for an extension of the summary judgment deadlines in this case. Plaintiffs consent to this request. These proposed extensions have been discussed and agreed upon by the parties as set forth below:

Summary Judgment Event	Current Deadline	New Proposed Deadline
Defendant’s motion for summary judgment	November 18, 2022	December 9, 2022
Plaintiffs’ opposition to Defendant’s motion and cross-motion for summary judgment	December 23, 2022	January 20, 2023
Defendant’s reply in further support of summary judgment and in opposition to Plaintiffs’ cross-motion	January 13, 2023	February 17, 2023
Plaintiffs’ reply in further support of summary judgment	February 3, 2023	March 10, 2023

We thank the Court for its consideration of this request.

Granted.
Denise Cote
11/16/22

Hon. Denise L. Cote
November 16, 2022

Page 2 of 2

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
Counsel for Defendant

By: /s/ Tomoko Onozawa
TOMOKO ONOZAWA
Assistant United States Attorney
Tel: (212) 637-2721
Fax: (212) 637-2717
Email: tomoko.onozawa@usdoj.gov

cc: All Counsel of Record (via ECF)